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8 *Former Attorneys for Official Unsecured*
9 *Creditors' Committee*

HONORABLE FREDERICK CORBIT

10 UNITED STATES BANKRUPTCY COURT
11 EASTERN DISTRICT OF WASHINGTON

12 In Re:

Case No. 18-03197-11

13 GIGA WATT INC.

Chapter 11

14 Debtor in Possession

15 NOTICE AND MOTION TO
16 LIMIT NOTICE OF DBS LAW'S
APPLICATION FOR
COMPENSATION

17 **PLEASE TAKE NOTICE** that DBS Law, former counsel for the Official
18 Unsecured Creditors' Committee, is filing herein a *Motion to Limit Notice of DBS*
19 *Law's Application for Compensation* (the "Motion"). Through the Motion, DBS
20 Law seeks to limit the parties who will receive notice of its application for
21 compensation—being filed simultaneously herewith—to the Chapter 11 Trustee,
22 the U.S. Trustee's Office, the Official Unsecured Creditors' Committee, anyone
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NOTICE AND MOTION TO LIMIT NOTICE OF
DBS LAW APPLICATION FOR
COMPENSATION - PAGE 1

DBS | LAW

A Professional Limited Liability Company
155 NE 100th Street, Suite 205 Seattle, WA 98125
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1 requesting ECF notice herein, and the 20 largest creditors as designated on the
2 Debtor's schedules.
3

4 **PLEASE TAKE FURTHER NOTICE** that any party opposing the Motion
5 must serve a written response on the undersigned counsel at 155 NE 100th St, Suite
6 205, Seattle, WA 98125, and file the response with the Clerk of the United States
7 Bankruptcy Court, 904 West Riverside Avenue, Suite 304, Spokane, WA
8 99201 within 21 days from the date of service of this Notice. The Court may enter
9 an order and grant the Motion without an actual hearing or further notice unless a
10 written objection is timely served and filed.
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13 ***MOTION TO LIMIT NOTICE OF DBS LAW'S APPLICATION FOR***
14 ***COMPENSATION***
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16 DBS Law, former counsel for the Unsecured Creditors' Committee of Giga
17 Watt, Inc. (the "Committee"), hereby requests the Court's authorization limit
18 notice of its *Application for Award of Compensation for Services Rendered and*
19 *Reimbursement of Expenses Pursuant to 11 USC 330, and for Approval of the*
20 *Payment of Bank Fees*, filed simultaneously herewith. DBS Law seeks to limit
21 notice to (a) the Chapter 11 Trustee, (b) the U.S. Trustee's Office, (c) the
22 Committee (now represented by a new firm), (d) all parties requesting ECF
23 notice, and (e) the 20 largest creditors as listed in the Debtor's schedules.
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1 Given that the Chapter 11 Trustee and the Committee are both engaged and
2 represented by counsel herein, DBS submits that limiting notice will not prejudice
3 any creditor. Further, the cost of serving over 350 creditors would be prohibitive,
4 especially given that DBS is no longer employed by the Committee and will not
5 be reimbursed for the expense incurred.
6

7
8 LBR 2002-1 permits less inclusive notice to be given “if not prohibited by
9 the Code or Rules and specifically allowed by the Court” LBR 2002-
10 1(b)(1)(B). DBS Law is not aware any specific prohibitions against the Court
11 entering an order permitting limitation of notice as requested herein, and submits
12 that good cause exists for doing so.
13

14
15 DATED this 13th day of November, 2019.

16 DBS | Law

17 /s/ Dominique Scalia
18 Daniel J. Bugbee, WSBA #42412
19 Dominique R. Scalia, WSBA #47313
20 Former Attorneys for Official Unsecured
21 Creditors Committee
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